

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**EOLAS TECHNOLOGIES INCORPORATED,**

**Plaintiff,**

**v.**

**AMAZON.COM, INC.,**

**Defendant.**

**Civil Action No. 6:15-cv-01038-RWS**

**LEAD CASE**

**JURY TRIAL DEMANDED**

**JOINT AGREED MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Pursuant to the Court's scheduling conference Order (Dkt. 44) the Court's oral guidance and orders at the April 7, 2016 scheduling conference, and the Court's April 21, 2016 Order (Dkt. 82), Plaintiff Eolas Technologies Incorporated ("Eolas" or "Plaintiff") and Defendants Amazon.com, Inc. ("Amazon"); Google Inc. ("Google"); and Wal-Mart Stores, Inc. and Wal-Mart Stores Texas, LLC ("Walmart") (collectively "Defendants") jointly submit an agreed proposed Protective Order, attached hereto.

Dated: April 29, 2016

Respectfully submitted,

/s/ Kevin L. Burgess

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on April 29, 2016.

/s/ James Quigley  
James Quigley

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that Eolas and Defendants have discussed the contemporaneously submitted Agreed Joint Protective, Joint Discovery, and Joint Docket Control Orders. After meeting and conferring by email and phone on the issues, the parties agreed they had reached an agreement on the issues, except as to issues discussed above and shown in the attached proposed order(s).

/s/ James Quigley  
James Quigley